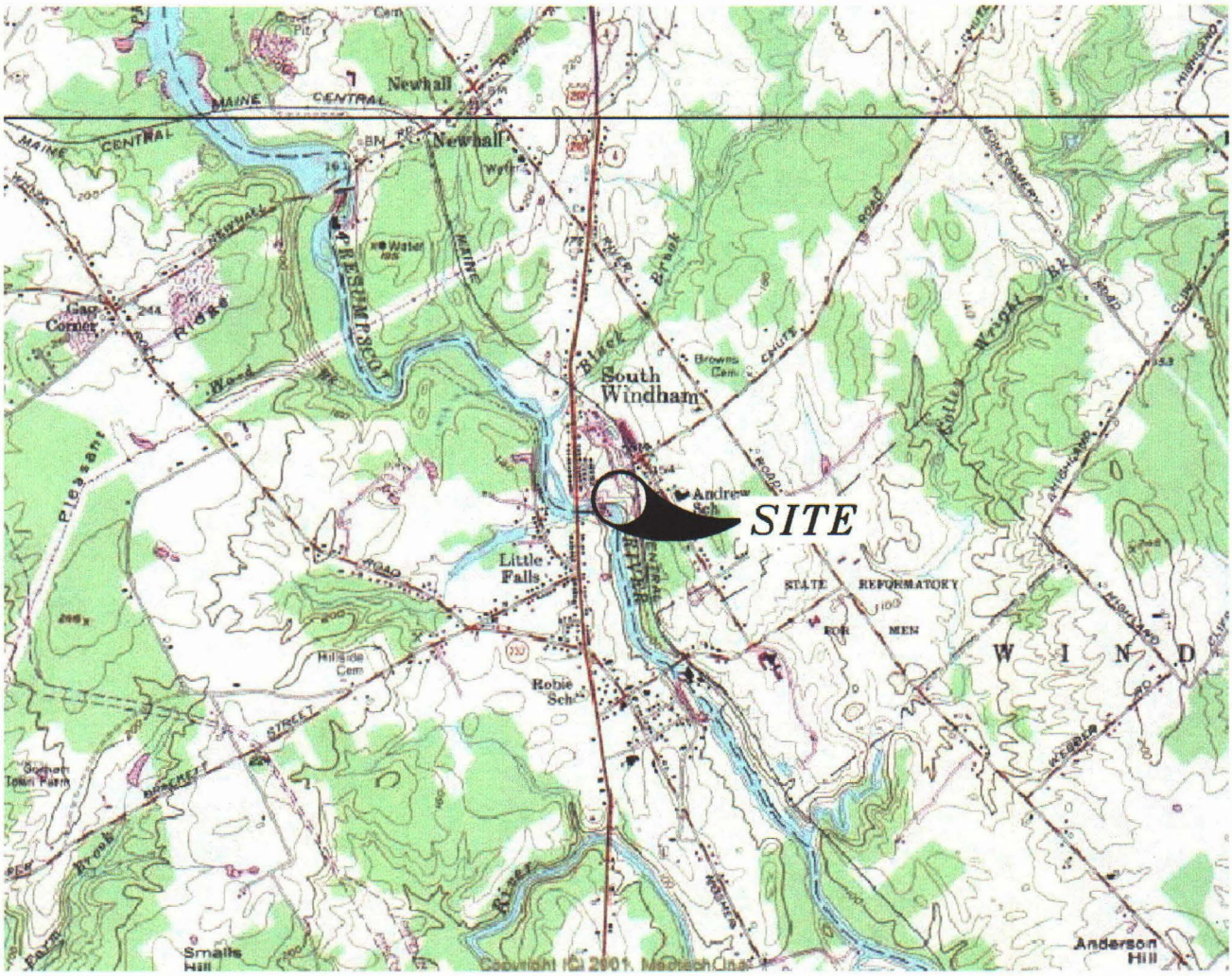
4.0 DOCUMENTATION

Ransom will provide documentation of clean-up for both the 7 and 13 Depot Street parcels for MDEP review. The report will include, at a minimum:

- Site clean-up methodologies
- Photo-documentation of clean-up activities
- Confirmatory test data
- Site restoration measures
- Waste disposal documentation

Upon review and approval of the site clean-up, we understand MDEP will issue a "Certificate of Completion." This certificate documents MDEP concurrence that site clean-up was completed in accordance with the Voluntary Response Action Plan presented herein.

Figures

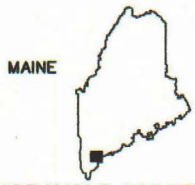


TAKEN FROM U.S.G.S. 7.5x15 MINUTE SERIES TOPOGRAPHIC MAP OF GORHAM, NAINE DATED 1975

CONTOUR INTERVAL IS 3 METERS

SITE COORDINATES: LATITUDE 43°44'06"
LONGITUDE 70°25'32"

UTM COORDINATES: 48: 43: 165mN
03: 85: 220mE



QUADRANGLE LOCATION

SCALE in FEET
1:25,000

RANSOM Environmental Consultants, Inc.

SITE LOCATION MAP

PREPARED FOR:	SITE:
RENEE LEWIS PORTLAND, MAINE	7 AND 13 DEPOT STREET WINDHAM, MAINE

DATE: MAY 2005
PROJECT: 046016
FIGURE: 1

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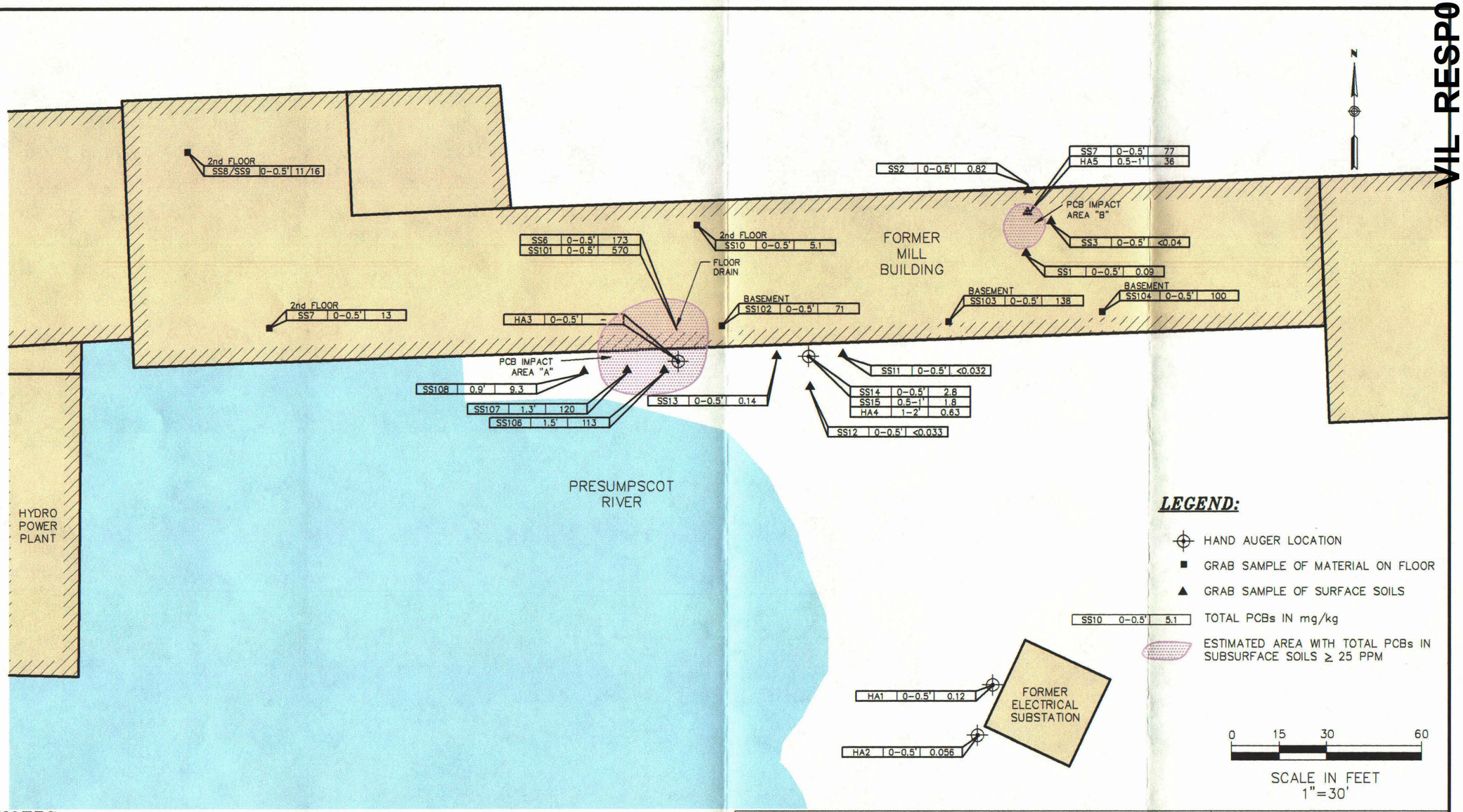
VIL_RESP00933



LEGEND:

- HAND AUGER LOCATION
- GRAB SAMPLE OF MATERIAL ON FLOOR
- GRAB SAMPLE OF SURFACE SOILS
- SS10 | 0-0.5' | 5.1 — TOTAL PCBs IN mg/kg
- ESTIMATED AREA WITH TOTAL PCBs IN SUBSURFACE SOILS ≥ 25 PPM

NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED SEPTEMBER 2, 2003
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

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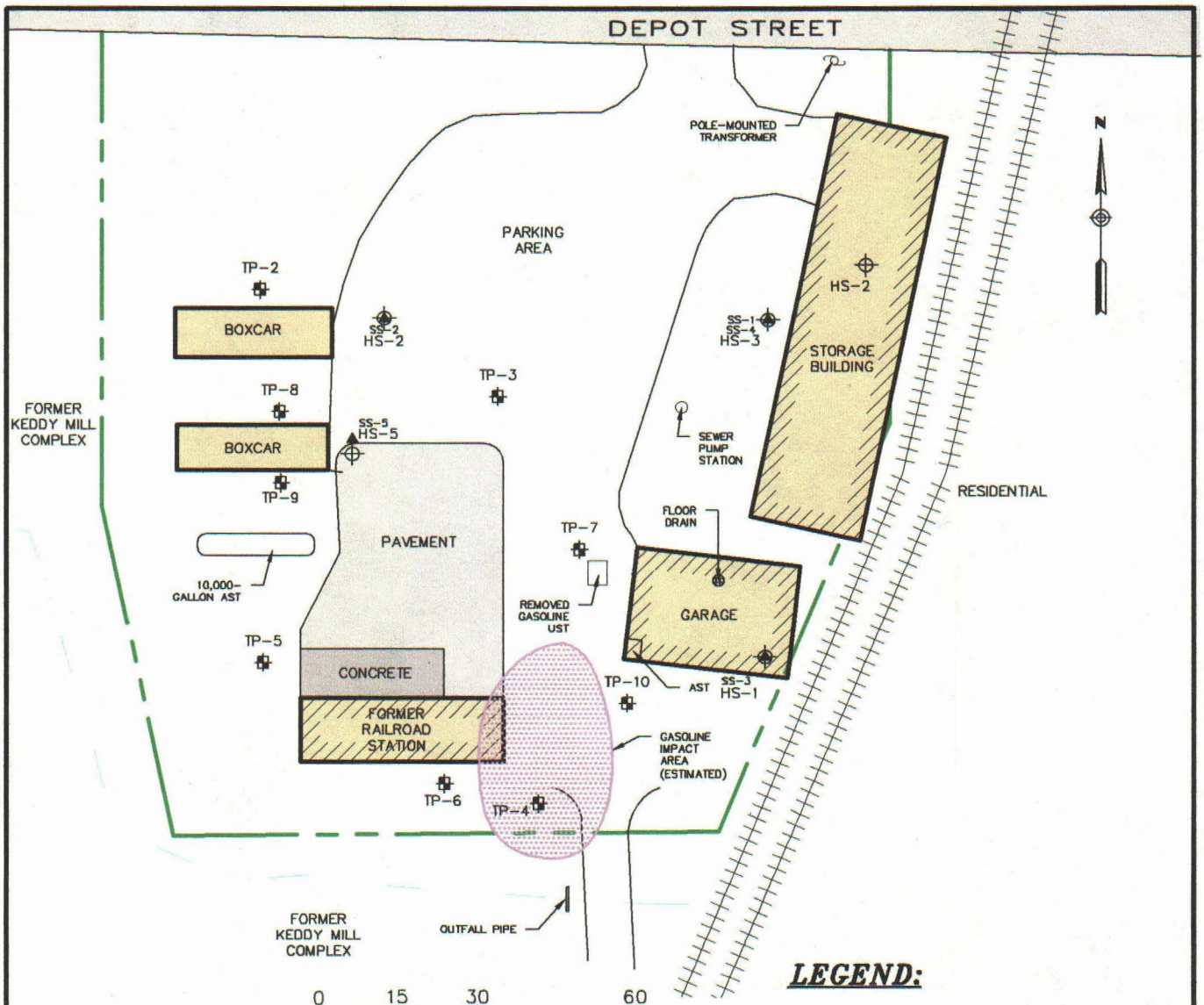
RANSOM Environmental Consultants, Inc.

PCB SAMPLE PLAN

PREPARED FOR:	SITE:	
RENEE LEWIS PORTLAND, MAINE	7 DEPOT STREET WINDHAM, MAINE	DATE: JUNE 2005 PROJECT: 046016 FIGURE: 2



LEGEND:

- SS-1 ▲ ⊕ SURFACE SAMPLE
- TP-1 ⊕ TEST PIT LOCATION
- STREAM
- PROPERTY BOUNDARY
- RAILROAD TRACKS
- ESTIMATED AREA WITH TOTAL PCBs IN SUBSURFACE SOILS ≥ 25 PPM

NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED JUNE 2, 2004.
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

RANSOM Environmental Consultants, Inc.

EXPLORATION PLAN

PREPARED FOR:	SITE:	
RENEE LEWIS PORTLAND, MAINE	13 DEPOT STREET WINDHAM, MAINE	DATE: MAY 2005 PROJECT: 046016 FIGURE: 3

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NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED SEPTEMBER 2, 2003
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

LEGEND:

ESTIMATED AREA WITH TOTAL PCBs IN SUBSURFACE SOILS ≥ 25 PPM

0 25 50 100

SCALE IN FEET
1"=50'

RANSOM Environmental Consultants, Inc.

PREPARED FOR:	SITE:	PROPOSED SITE DEVELOPMENT
RENEE LEWIS PORTLAND, MAINE	7 DEPOT STREET WINDHAM, MAINE	DATE: JUNE 2005 PROJECT: 046016 FIGURE: 4

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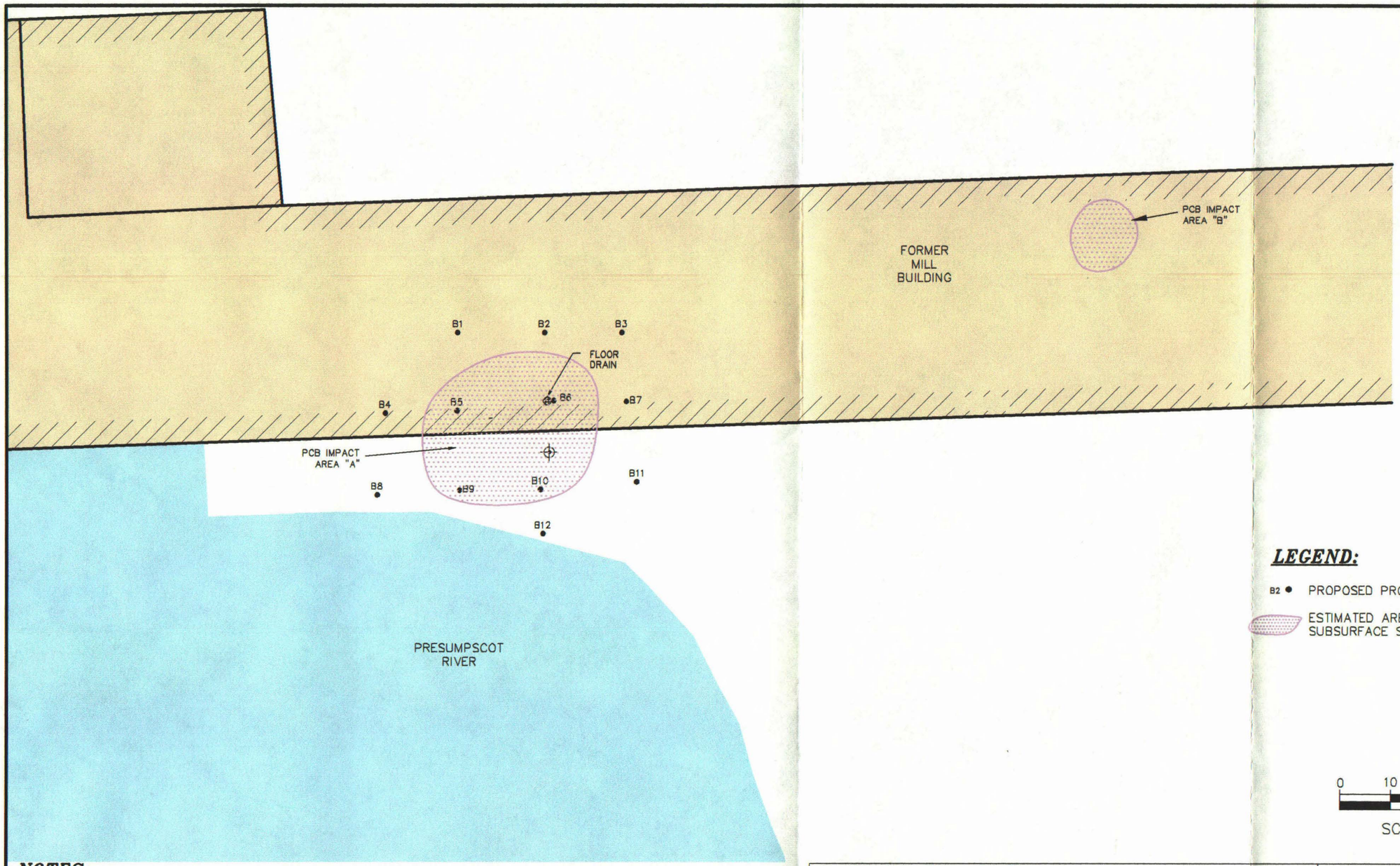
VIL_RESP00936



LEGEND:

B2 ● PROPOSED PROBE LOCATION

ESTIMATED AREA WITH TOTAL PCBs IN SUBSURFACE SOILS ≥ 25 PPM

0 10 20 40

SCALE IN FEET
1"=20'

NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED SEPTEMBER 2, 2003
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

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RANSOM Environmental Consultants, Inc.

PREPARED FOR:	SITE:	***PROPOSED BORINGS***
RENEE LEWIS PORTLAND, MAINE	7 DEPOT STREET WINDHAM, MAINE	DATE: JUNE 2005 PROJECT: 046016 FIGURE: 5

Appendix A
Data from Jacques Whitford Report

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	TP-101	TP-102	TP-102	TP-103	TP-104	TP-107	TP-107	TP-110
Depth of Sample	Residential	8-10'	0-2'	4-6'	0-2'	10-12'	2-4'	8-10'	0-2'
Date Collected	Guideline	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003
DRO (mg/kg)									
DIESEL RANGE ORGANICS		10	NA	NA	NA	U 6.8	NA	9	NA
Metals (mg/kg)									
ARSENIC	10	NA	**16**	5	**11**	NA	3	NA	**16**
BARIUM	10,000	NA	45	98	75	NA	87	NA	81
CADMIUM	27	NA	U 8.78	U 1.00	U 4.69	NA	U 1.06	NA	U 1.00
CHROMIUM	950	NA	266	7	133	NA	18	NA	16
LEAD	375	NA	150	12	164	NA	24	NA	49
MERCURY	60	NA	0	U 0.048	0	NA	0	NA	0
SELENIUM	950	NA	U 8.8	U 1.0	U 4.7	NA	U 1.1	NA	U 1.0
SILVER	950	NA	U 1.5	U 1.5	U 1.5	NA	U 1.6	NA	U 1.5
PCBs (ug/kg)									
AROCLOR-1016	100	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1221	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1232	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1242	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1248	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1254	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1260	*	NA	NA	NA	NA	NA	NA	NA	NA
Total PCBs (sum of above)	2,200	NA	NA	NA	NA	NA	NA	NA	NA
VOCs (ug/kg)									
METHYLENE CHLORIDE	13,000	17	NA	NA	NA	7	NA	10	NA
TRICHLOROFLUOROMETHANE	*	190	NA	NA	NA	70	NA	68	NA
Other Compounds									
TOTAL SOLIDS (%)	*	73	92	84	88	74	84	80	90

Notes:

* Regulatory Guideline Not Available

Bold values indicate an excedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	TP-111	TP-112	HA-1	HA-2	HA-4	HA-5	HA-6	SS1
Depth of Sample	**Residential**	**2-4'**	**0-2'**	**0-0.3'**	**0-0.3'**	**1-2'**	**0.5-1'**	**0-0.3'**	**0-0.5'**
Date Collected	**Guideline**	**8/4/2003**	**8/4/2003**	**8/4/2003**	**8/4/2003**	**8/4/2003**	**8/8/2003**	**8/4/2003**	**11/25/2003**
DRO (mg/kg)									
DIESEL RANGE ORGANICS		29	NA	63	NA	2,900	3,300	9,100	NA
Metals (mg/kg)									
ARSENIC	10	NA	**22**	NA	NA	NA	NA	NA	NA
BARIUM	10,000	NA	251	NA	NA	NA	NA	NA	NA
CADMIUM	27	NA	U 2.21	NA	NA	NA	NA	NA	NA
CHROMIUM	950	NA	55	NA	NA	NA	NA	NA	NA
LEAD	375	NA	338	NA	NA	NA	NA	NA	NA
MERCURY	60	NA	1	NA	NA	NA	NA	NA	NA
SELENIUM	950	NA	U 2.2	NA	NA	NA	NA	NA	NA
SILVER	950	NA	U 1.6	NA	NA	NA	NA	NA	NA
PCBs (ug/kg)									
AROCLOR-1016	100	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1221	*	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1232	*	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1242	*	NA	NA	U 20	U 20	99	U 200	NA	U 39.0
AROCLOR-1248	*	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1254	*	NA	NA	79	56	530	24,000	NA	89.9
AROCLOR-1260	*	NA	NA	40	U 20	U 18	12,000	NA	U 39.0
Total PCBs (sum of above)	2,200	NA	NA	119	56	629	**36,000**	NA	90
VOCs (ug/kg)									
METHYLENE CHLORIDE	13,000	U6	NA	NA	NA	NA	NA	6	NA
TRICHLOROFLUOROMETHANE	*	61	NA	NA	NA	NA	NA	48	NA
Other Compounds									
TOTAL SOLIDS (%)	*	84	79	85	83	93	84	96	83.6

Notes:

* Regulatory Guideline Not Available

Bold values indicate an excedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	SS2	SS3	SS5	SS6	SS7	SS8	SS9
Depth of Sample	Residential	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'
Date Collected	Guideline	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003
DRO (mg/kg)								
DIESEL RANGE ORGANICS		NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)								
ARSENIC	10	NA	NA	NA	NA	NA	NA	NA
BARIUM	10,000	NA	NA	NA	NA	NA	NA	NA
CADMIUM	27	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	950	NA	NA	NA	NA	NA	NA	NA
LEAD	375	NA	NA	NA	NA	NA	NA	NA
MERCURY	60	NA	NA	NA	NA	NA	NA	NA
SELENIUM	950	NA	NA	NA	NA	NA	NA	NA
SILVER	950	NA	NA	NA	NA	NA	NA	NA
PCBs (ug/kg)								
AROCLOR-1016	100	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	**3,210**
AROCLOR-1221	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1232	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1242	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1248	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1254	*	500	U 40	44,800	120,000	13,100	11,200	9,590
AROCLOR-1260	*	317	U 40	32,200	53,500	U 33.1	U 54.6	3,540
Total PCBs (sum of above)	2,200	817		**77,000**	**173,500**	**13,100**	**11,200**	**16,340**
VOCs (ug/kg)								
METHYLENE CHLORIDE	13,000	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	*	NA	NA	NA	NA	NA	NA	NA
Other Compounds								
TOTAL SOLIDS (%)	*	83	81.2	80.8	68.5	95.5	90.3	90.4

Notes:

* Regulatory Guideline Not Available

Bold values indicate an excedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	SS10	SS11	SS12	SS13	SS14	SS15	SS101
Depth of Sample	Residential	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0.5-1.0'	fl. drain
Date Collected	Guideline	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	1/13/2004
DRO (mg/kg)								
DIESEL RANGE ORGANICS		NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)								
ARSENIC	10	NA	NA	NA	NA	NA	NA	**17.5**
BARIUM	10,000	NA	NA	NA	NA	NA	NA	126
CADMIUM	27	NA	NA	NA	NA	NA	NA	<0.651
CHROMIUM	950	NA	NA	NA	NA	NA	NA	158
LEAD	375	NA	NA	NA	NA	NA	NA	109
MERCURY	60	NA	NA	NA	NA	NA	NA	<0.243
SELENIUM	950	NA	NA	NA	NA	NA	NA	<3.91
SILVER	950	NA	NA	NA	NA	NA	NA	<2.61
PCBs (ug/kg)								
AROCLOR-1016	100	U 43.9	U 32.2	U 32.5	U 35.1	**499**	**222**	<4410
AROCLOR-1221	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1232	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1242	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1248	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1254	*	5,100	U 32.2	U 32.5	135	1770	1170	262,000
AROCLOR-1260	*	U 43.9	U 32.2	U 32.5	U 35.1	532	445	<4410
Total PCBs (sum of above)	2,200	**5,100**			135	**2,801**	1,837	**262,000**
VOCs (ug/kg)								
METHYLENE CHLORIDE	13,000	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	*	NA	NA	NA	NA	NA	NA	NA
Other Compounds								
TOTAL SOLIDS (%)	*	88.9	92.2	95.3	98.2	84.2	90.5	70.9

Notes:

* Regulatory Guideline Not Available

Bold values indicate an excedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	SS101 (dup)	SS102	SS103	SS104	SS105	SS106	SS107
Depth of Sample	Residential	fl. drain	soil on fl.	soil on fl.	soil on fl.	1'	1.5'	1.3'
Date Collected	Guideline	1/13/2004	1/13/2004	1/13/2004	1/13/2004	1/13/2004	1/13/2004	2/3/2004
DRO (mg/kg)								
DIESEL RANGE ORGANICS		NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)								
ARSENIC	10	NA	NA	NA	NA	**13.6**	NA	NA
BARIUM	10,000	NA	NA	NA	NA	73.4	NA	NA
CADMIUM	27	NA	NA	NA	NA	<0.714	NA	NA
CHROMIUM	950	NA	NA	NA	NA	32	NA	NA
LEAD	375	NA	NA	NA	NA	212	NA	NA
MERCURY	60	NA	NA	NA	NA	0.25	NA	NA
SELENIUM	950	NA	NA	NA	NA	<4.28	NA	NA
SILVER	950	NA	NA	NA	NA	<2.86	NA	NA
PCBs (ug/kg)								
AROCLOR-1016	100	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1221	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1232	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1242	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1248	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1254	*	570,000	71,100	138,000	100,000	NA	113,000	120,000
AROCLOR-1260	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
Total PCBs (sum of above)	2,200	**570,000**	**71,100**	**138,000**	**100,000**	NA	**113,000**	**120,000**
VOCs (ug/kg)								
METHYLENE CHLORIDE	13,000	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	*	NA	NA	NA	NA	NA	NA	NA
Other Compounds								
TOTAL SOLIDS (%)	*	54.9	92.6	94.9	90.9	68.2	67.1	73.4

Notes:

* Regulatory Guideline Not Available

Bold values indicate an excedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

	Analyte	Maine DEP	SS108
	Depth of Sample	**Residential**	**0.9'**
	Date Collected	**Guideline**	**2/3/2004**
DRO (mg/kg)			
	DIESEL RANGE ORGANICS		NA
Metals (mg/kg)			
	ARSENIC	10	NA
	BARIUM	10,000	NA
	CADMIUM	27	NA
	CHROMIUM	950	NA
	LEAD	375	NA
	MERCURY	60	NA
	SELENIUM	950	NA
	SILVER	950	NA
PCBs (ug/kg)			
	AROCLOR-1016	100	<140
	AROCLOR-1221	*	<140
	AROCLOR-1232	*	<140
	AROCLOR-1242	*	<140
	AROCLOR-1248	*	<140
	AROCLOR-1254	*	9,300
	AROCLOR-1260	*	<140
	Total PCBs (sum of above)	2,200	**9,300**
VOCs (ug/kg)			
	METHYLENE CHLORIDE	13,000	NA
	TRICHLOROFLUOROMETHANE	*	NA
Other Compounds			
	TOTAL SOLIDS (%)	*	61.8

Notes:

* Regulatory Guideline Not Available

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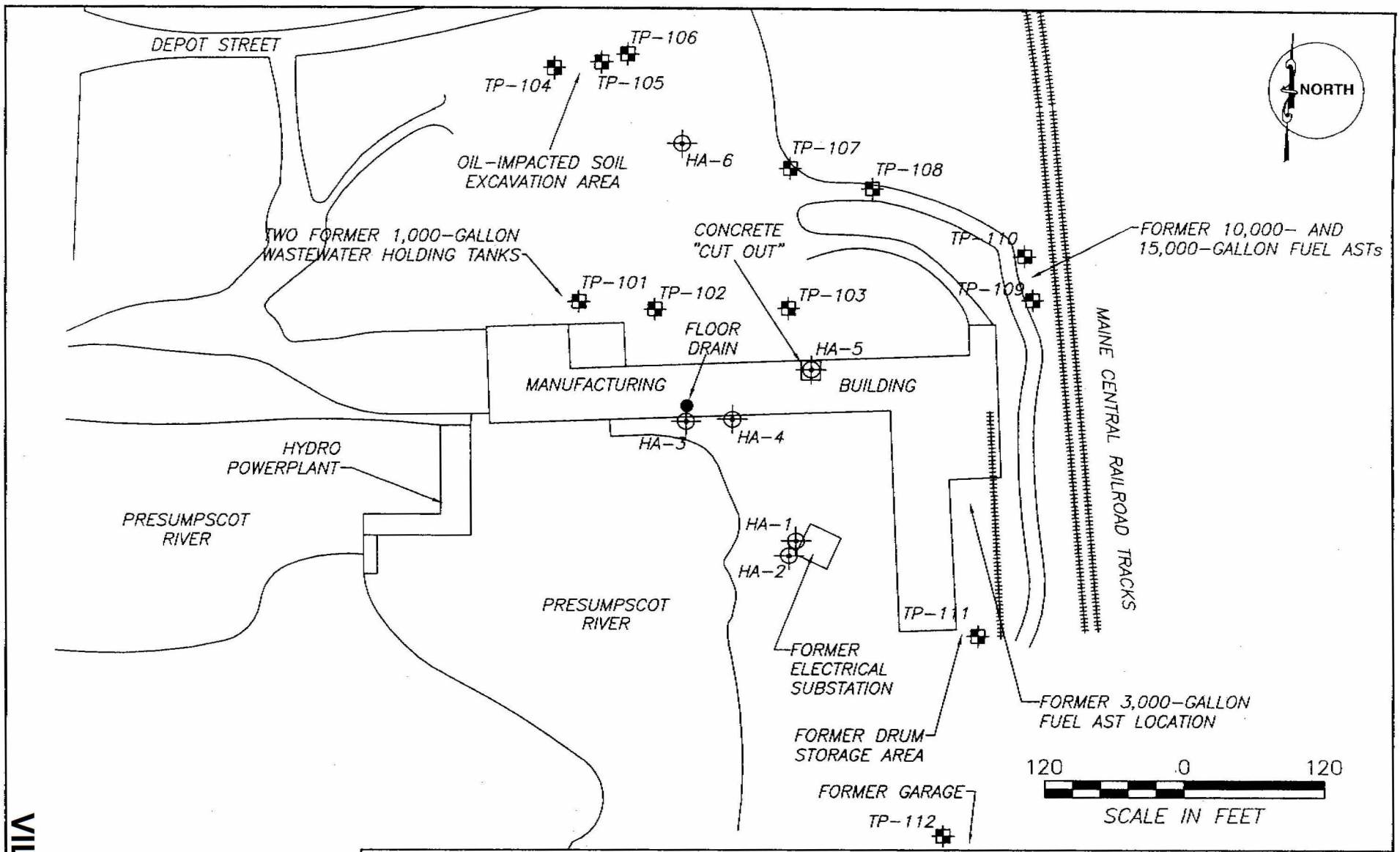
VOCs = Volatile Organic Compounds

NA = Not Analyzed



Legend

- HAND AUGER LOCATION
- TEST PIT LOCATION

VIL_RESP00945

Jacques Whitford Company, Inc.

JACQUES WHITFORD LOCATION: PORTLAND, MAINE				
DATE PREPARED: 9-02-03	DESIGNED BY: DVC	DRAWN BY: TS	CHECKED BY: BSB	REVIEWED BY: DVC
REVISION DATE:	REVISION NO:	DRAWN BY:	CHECKED BY:	REVIEWED BY:
PROJECT NAME/FILE NAME: 7 DEPOT STREET/SITE		PROJECT NUMBER/PHASE: MEP03102/*	SCALE: 1"=120'	

DRAWING TITLE: **SITE PLAN**
SEVEN DEPOT STREET
WINDHAM, MAINE

PREPARED FOR: RENEE LEWIS

FIGURE NO. 2

75 Pearl Street, Suite 410 X Portland, ME 04101 XTel: 207-761-7790 Fax: 207-761-7631

June 30, 2004

Ms. Renee J. Lewis
50 Monument Square, 2nd Floor
Portland, Maine 04101

RE: 13 Depot Street, Windham, Maine
Jacques Whitford Project No. mep04127

Dear Ms. Lewis:

Jacques Whitford Company, Inc. (Jacques Whitford) is pleased to provide this letter to further clarify uncertainties associated with our recent investigation at the 13 Depot Street site. As you are aware, our investigations identified gasoline impacted soil approximately 50 feet down slope from a former underground gasoline storage tank. While field evidence indicates the impacted soils may be localized and only moderately impacted, further investigation and review by the Maine Department of Environmental Protection (DEP) will be necessary to determine the nature and scope of any future clean-up action.

Clean-up guidelines for petroleum-impacted sites are published by DEP. Based on these guidelines and our knowledge of the site, we have characterized the site as "Baseline-2." Under Baseline-2 clean up standards, soils at the site would require clean up to 500-1000 parts per million (ppm) using a field screening instrument. More stringent, "Intermediate" clean up standards could be imposed by DEP if they believe area water supplies are at risk from the site. As we note in our report, three private wells are reported to exist within 1,000 feet of the site, even though public water supply is available. Further, DEP could require a potentially costly groundwater investigation if they seek confirmation that free-phase petroleum product does not exist on the water table.

In light of these uncertainties, we recommend that any business transaction associated with this property include adequate time for DEP review of existing environmental reports to better define future actions at the site. The timetable should also allow for completion of additional investigation, if deemed necessary, to qualify environmental risk. It is important to note that the investigations conducted at the site to date have been preliminary in nature, and have not necessarily identified all environmental concerns at the site.

Sincerely yours,
Jacques Whitford Company, Inc.

D. Todd Coffin, C.G.
Project Manager

STATE OF MAINE D. TODD COFFIN No. 310 CERTIFIED GEOLOGIST

VIL_RESP00946

PHASE I AND II
ENVIRONMENTAL SITE ASSESSMENTS
Former Depot Energy Company
13 Depot Street, Windham, Maine

Prepared for:

Ms. Renee Lewis
50 Monument Square, 2nd Floor
Portland, Maine 04101

Prepared by:

Jacques Whitford Company, Inc.
75 Pearl Street, Suite 410
Portland, Maine 04101
Tel: (207) 761-7790
Fax: (207) 761-7631
www.jacqueswhitford.com

Jacques Whitford Project No. MEP04127

June 17, 2004

EXECUTIVE SUMMARY

Jacques Whitford conducted Phase I and II Environmental Site Assessments (ESAs) at 13 Depot Street, Windham, Maine (the "Subject Site"). The Subject Site is located on the southern side of Depot Street adjacent to Maine Central Railroad tracks approximately 300 feet west of High Street.

The Subject Site is designated by the Windham Assessor's Office as Map 38, Lot 6 and is approximately 40,850 square feet. The site is currently zoned as Industrial (I). The Subject Site is improved with a one-and-a-half story, wood frame garage, a one-and-a-half story wood frame former railroad station, a one story wood-frame storage/residential building resting on concrete piers, two steel railroad box cars with wood floors, one 10,000-gallon railroad tank car, and an in-ground scale.

We observed a 55-gallon drum labeled oil and another labeled antifreeze, numerous unmarked closed 5-gallon containers, unlabelled open containers apparently containing petroleum, automotive gasoline tanks containing petroleum, and empty 55-gallon drums (one marked corrosive). We also observed numerous automobile transmissions, engines, automotive batteries, 25-30 junked automobiles, other automotive parts, and miscellaneous debris piles on the subject site. Residual petroleum was observed in the tank car.

According to the Portland Water District, the Subject Site has been serviced by municipal water since 1948. A sewerage lift station was observed at the site. According to a former owner, Merrill Lasky, the septic/lift station pumps effluent from the bathroom in the garage and the bathroom in the storage building to the municipal sewer in Depot Street.

One floor drain was observed in the garage. Staining and an open container of petroleum was observed near the drain. Mr. Lasky indicated that the drain discharged directly to the subsurface under the building. We observed a PVC outfall pipe discharging to a drainage ditch at the adjoining mill property near the Subject Site's southerly property line. Mr. Lasky believed this outfall pipe drained the subsurface area near the in-ground scale.

Jacques Whitford utilized the services of Environmental Data Resources, Inc. to perform a search of federal and state environmental databases for sites of potential environmental concern within applicable ASTM radii. The Subject Site was identified on the EDR, Inc. database as a UST and LUST site. No other sites likely to impact the Subject Site were identified. Likewise, no sites of environmental concern were identified during review of records from the Windham Fire Department, Windham Building Department, Windham Historical Society, Windham Assessor's Office, or Maine Historical Society.

Due to the age of buildings and subsequent renovations, suspect asbestos-containing materials (ACMs) and lead-based paint may exist in the on-site building. We also observed possible ACM insulation between the inner and outer steel layers of the railroad tank car at the site.

Jacques Whitford reviewed a previous consulting report for the site written in connection with the removal of a 500-gallon underground gasoline tank from the site in 1993. The report,

prepared by Acadia Environmental, indicated a release from the UST. Acadia measured a level of 591 ppm with a photoionization device in black soil at 3-4 feet below ground surface and found a TPH level of 77 mg/Kg in the soil.

Based on the results of the Phase I ESA, Jacques Whitford conducted a Phase II ESA at the site. We oversaw the installation of test pits and collected soil samples for bag headspace screening with a PID and chemical testing. Most of the PID results were less than 200 ppm. Two samples from one testpit near the former UST grave tested greater than 1,000 ppm with the PID. No elevated PID readings were observed in surface soil or in floor drain sediment.

Jacques Whitford submitted three test pit soil samples and five surface soil or sediment samples to Spectrum Analytical of Agawam, Massachusetts for testing of volatile organic compounds, gasoline range organics, PCBs, and/or the 8 RCRA metals. Elevated levels of gasoline constituents were detected in a sample downgradient of the former gasoline UST (TP-4); however, concentrations did not exceed the Maine Department of Environmental Protection (MDEP) Table 4 Residential Soil Criteria. The only exceedences recorded were of arsenic, which at 12.8 and 15.6 mg/kg, exceeded the 10 mg/kg Table 4 residential standard.

Based on the information gathered and on observations made during this investigation, the Phase I and II ESAs have revealed evidence of recognized environmental conditions associated with the Subject Site. Jacques Whitford concludes the following:

clean-up excavation tree

1. Gasoline contaminated soil was encountered at the site in 1993 during removal of a gasoline UST; the removal was monitored by Acadia Environmental Technology. MDEP was notified of the findings and no further action was required. The recent investigation by Jacques Whitford identified gasoline-impacted soils down slope from the former tank. The concentration of residual gasoline in the soils exceeded the MDEP Baseline-2 standard.

2. A floor drain was observed in the garage building. According to a former owner, the drain discharges directly to the subsurface below the garage. The drain was located near an open container of petroleum and floor staining. No high PID readings or PCBs were detected in sediment in the floor drain. Nevertheless, petroleum products could have been discharged over time and released to the subsurface beneath the building. As a solid surface existed at the bottom of the drain and due to the surrounding concrete floor, collecting a subsurface soil sample in the vicinity of the drain was not performed during this phase of work.

3. While oil staining was apparent on the ground surface around stored parts and machinery on site, field observations during test pitting, PID screening and lab testing of soils suggests that the staining is relatively localized..

4. Of the 8 RCRA metals tested at two surficial soil sampling locations, only arsenic exceeded the MDEP's residential soil criteria. This arsenic may be naturally occurring.

5. Jacques Whitford observed suspect ACM and lead-based paint in building materials and in insulation between the walls of the 10,000-gallon aboveground storage tank (AST) at the site.

Based on the evidence of recognized environmental conditions associated with the Subject Site, Jacques Whitford recommends the following:

1. Completion of an asbestos survey if proposed or future renovation or demolition activities will impact suspect ACMs at the Subject Site.

2. Completion of concrete coring and hand augering adjoining the garage floor drain. Collection of soil samples for PID screening and analytical testing for appropriate parameters.

3. Submission of this report and any follow-up testing to the MDEP Voluntary Response Action Program (VRAP) as a first step in obtaining a "No Action Assurance Letter."

4. With MDEP concurrence, removal of petroleum contaminated soil with PID readings that exceed the MDEP Baseline–2 standard. Soil removal should be preceded by investigation of the extent of impacted soils in the vicinity of the former UST (*e.g.*, geoprobes or additional test pits).

5. Preparation and submission of a clean-up report to MDEP to establish "closure" status for the site and associated impacted soils identified, as well as to support the VRAP process.